

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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UNITED STATES DISTRICT COURT

Civil Action

Greenbelt

District of Maryland

Richard B. Martin Jr., Esq.
(*Plaintiff*)

v.

Docket Number

[Signature] 19 CV 3223

Erin Danz, Carroll County Health
Services Corporation, Carroll
Hospital Center, David Bland, *et*
al.
(*Defendants*)

INITIATING COMPLAINT

PARTIES

Richard B. Martin Jr., Esq.: Georgetown Ministry Center; 1041 Wisconsin Ave.
NW; Washington, DC 20007

Erin Danz (Agent and Individual Capacity): 101 N Court St.; Westminster, MD
21157

Carroll County Health Services Corporation: 292 Stoner Ave.; Westminster, MD
21157

Carroll Hospital Center: 200 Memorial Ave.; Westminster, MD 21157

David Bland (Agent and Individual Capacity): 200 Memorial Ave.; Westminster,
MD 21157

MOST SACRED HOLY WRIT

The fear of the Lord is the beginning of knowledge, but fools despise wisdom and instruction.

Proverbs 1:7

The righteous detest the dishonest; the wicked detest the upright.

Proverbs 29:27

When justice is done, it brings joy to the righteous but terror to evildoers.

Proverbs 21:15

Whoever says to the guilty, "You are innocent," will be cursed by peoples and denounced by nations. But it will go well with this who convict the guilty, and rich blessing will come on them.

Proverbs 24:24-25

STATEMENT OF TRUTH

God, the Father of Abraham, Isaac, Jacob and Jesus, is the Most High and worshipping Him is most righteous and just.

I was made in God's perfect image. Only by His Divine Grace, I am His Son and He is My Father.

Truth, Love, Natural Law and Justice proceed graciously and directly from GOD.

I love God, My Family, Natural Law, Justice, America, The U.S. Constitution, The State of Maryland and The Maryland Constitution.

Lies, Unnatural Law and Injustice vilely and despicably spew from Satan.

I hate Satan.

I love all people. I hate all sin. I love all of God's Creation. I hate all of Satan's Abominations.

MOTIVATING FACTORS FOR BRINGING THIS JUSTIFIED CIVIL ACTION

I am prosecuting this civil action, because Justice demands it. What the defendants did to me is pure evil. Without a doubt, innocent people are being destroyed by diabolical actions such as these. I want those involved in this case to stop hurting innocent people. They could have killed me.

JURISDICTION

28 U.S. Code § 1332 - Diversity of citizenship; amount in controversy; costs

- Plaintiff and defendants are citizens of different states
- Matter in controversy exceeds 75,000 USD

STATEMENT OF FACTS

On November 10th, 2017; I was experiencing a terrifying-Post-Traumatic-Stress-Disorder flashback. Therefore, as we are told to do, I called 911 and requested that I be taken to the hospital.

I was transported by the Maryland State Police to the Carroll Hospital Center which is owned by Carroll County Health Services Corporation, including Erin Danz.

While there male nurse David S. Bland was very antagonistic towards me.

I lawfully and dutifully told Bland that he was bothering me. Without following proper-medical protocol, he immediately had me forced medicated. **This was an aggravated assault under the guise of appropriate medical treatment.**

Around two days later, I had regained some strength. Lawfully and dutifully, I told Bland that I was outraged that he had violated me. Without following proper-medical protocol, he immediately attempted to have me forced medicated.

This time, I lawfully and dutifully attempted to defend myself. I was very weak. My sickly blows caused to injury at all.

Bland angrily stated, "Now, you have an assault charge!"

Again, I was violated with an aggravated assault under the guise of appropriate medical treatment.

I was coerced to take medication and released.

I was maliciously prosecuted by defendants in the Carroll County District Court.

As a part of the diabolical process, I was tortured for two months by means of sleep deprivation.

CHARGES

I. Assault

- A. Clearly, I was in reasonable apprehension of an imminent harmful and offensive contact, because I instinctively and justly struck Bland, and the defendants did make harmful and offensive contact when I was unlawfully “force medicated,” twice.

II. Battery

- A. The defendants clearly did voluntarily bring about unconsented-harmful-and-offensive contact with me when they “forced medicated” me, twice.

III. Intentional Infliction of Emotional Distress

- A. The defendants, acted recklessly, extreme, and outrageously while I was under their care. Unbelievably, they actually maliciously prosecuted me and had me tortured.

IV. Malicious Prosecution

- A. The defendants did initiate a criminal action without probable cause. It is completely absurd and deeply immoral that someone would go to the hospital while experiencing a PTSD flashback to get help and the hospital would frame and prosecute the patient.

V. Negligence

- A. The defendants had a legal duty to exercise reasonable care towards me when I was in their custody. The defendants utterly failed to exercise reasonable care. As any person would, I suffered severe emotional distress as a direct result of the defendants not exercising reasonable care. Unbelievably, they actually maliciously prosecuted me and had me tortured.

REQUEST FOR RELIEF

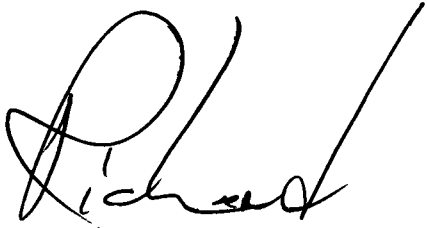
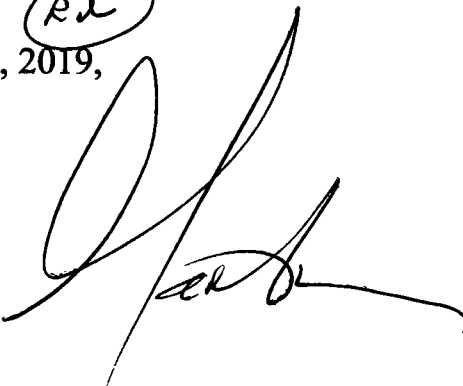
250 M USD in compensatory and punitive damages.

JURY DEMAND

I demand a trial by jury for this complaint.

I DECLARE UNDER THE PAINS AND PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

FOR GOD AND COUNTRY,
EXECUTED ON NOVEMBER 8th, 2019,

**RICHARD B. MARTIN JR., ESQ.
GEORGETOWN MINISTRY CENTER
1041 WISCONSIN AVE. NW
WASHINGTON, DC 20007**